RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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1 February 2002

Mr. Ed Boyle, Remedial Project Manager
US Department of the Navy
Engineering Field Activity Northeast
Naval Facilities Engineering Command
10 Industrial Highway
Lester, PA 19113-2090

RE: Work Plan Addendum #2
Subsurface Investigation at Building 41
IR Program Site 16
(Former Creosote Dip Tank and Fire Fighting Training Area)
Naval Construction Battalion Center
Davisville, Rhode Island
Submitted 18 January 2002, Dated January 2002

Dear Mr. Boyle;

The Rhode Island Department of Environmental Management, Office of Waste Management (RIDEM) has reviewed the above referenced document and has the following comments to offer:

1. Page 3 of 12, Section 4, Field Procedures, Bullet 2 – It is noted that clearances will be obtained from NCBC Davisville at telephone # (401) 294-6108. This number is no longer in existence. Please correct.

2. Page 4 of 12, Section 4.1.1, Soil Boring and Sampling, Paragraph 1 – It is stated that the PID will be calibrated each workday before work begins, after lunch, and as required in the field. Please add to this that the PID will be calibrated at the end of the workday to insure that results taken after lunch are usable.

3. Page 4 of 12, Section 4.1.2, Collection of Soil for Chemical Analysis, Paragraph 1 – The section notes if a headspace value does not exist then a sample for chemical analysis will be taken at the apparent water table, interval just above competent bedrock, and the sample depth interval located midway between these first two

selected sample intervals. A PID does not pick up all forms of contamination, therefore consideration should be given to taking the sample from visually contaminated areas as well.

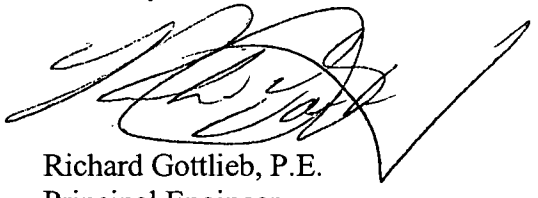
4. General Comment: Cosmolene is a heavy petroleum product which is mostly semi-volatiles. This work plan is measuring primarily volatiles. The compounds that the PID detects is heavily dependant on the type of bulb used (10.6 eV vs 11.7 eV etc.). Therefore, in addition to the PID, all samples should be screened with a FID using standard jar headspace analysis. Use of both instruments will insure field detection of contaminants and avoid concerns inherent with each of the particular instruments. This technique is routinely used at Naval Station Newport.

5. General Comment: As noted above, this work plan is primarily measuring volatiles and cosmolene is mostly comprised of semi-volatiles. The borings need to be sampled for TPH utilizing a GC extractable method. For boring locations A and B the boring should be taken in the middle of the former tank location, not down gradient of the former tank location. Two samples for TPH should be taken. In the absence of field evidence the first sample should be taken at a minimum of two feet below the former tank bottom elevation (to avoid sampling clean fill from the tank removal) and the second a few inches above the water table. TPH need not be sampled for at boring location C.

6. General Comment: In the reports presented to RIDEM it is noted that there was a 650-gallon above ground storage tank for heating oil. There are two boiler rooms which would imply two heating storage tanks. Please provide information on how the other storage tank was closed.

RIDEM looks forward to working with the Navy and USEPA on the completion of studies at this site. If you have any questions or require additional information please call me at (401) 222-2797 ext. 7138 or e-mail me at rgottlie@dem.state.ri.us.

Sincerely,



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